

VALENZUELA, ET AL. V. SWIFT BEEF COMPANY, INC., ET AL.
UNITED STATES DISTRICT COURT, NORTHERN DISTRICT OF TEXAS, CIV. NO. 3-06CV23222-N
BMS PRIVILEGE LOG RE PLAINTIFFS' SUBPOENA DUCES TECUM-- 7/15/08

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Bates	Date	Author(s)	Recipient(s)	Copied To	Type	Subject	Privilege Asserted
BMS0052- BMS0053	10/27/07	Mark Reed	Jack Shandleley, Chad Hamilton, Esq., Swift		Email	Status of ICE investigation	Attorney-Client Work Product Consultative Expert
BMS0074	05/30/06	Mark Reed	Stuart Johnston, Esq., V&E		Email	Communication regarding Swift legal strategy for matters related to ICE	Attorney-Client Work Product Consultative Expert
BMS0075	05/31/06	Mark Reed	Stuart Johnston, Esq., V&E		Email	Communication regarding Swift's legal strategy for matters related to ICE	Attorney-Client Work Product Consultative Expert
BMS0076	06/13/06	Mark Reed	Stuart Johnston, Esq., V&E		Email	Communications related to Swift's legal position concerning ICE	Attorney-Client Work Product Consultative Expert
BMS0083- BMS0084	06/26/06	Mark Reed	Stuart Johnston, Esq., V&E	Dan Wiseman, Esq., Swift; Jack Shandleley; Michael Buxton, Esq., V&E	Email	Communication regarding Swift's legal strategy for matters related to ICE	Attorney-Client Work Product Consultative Expert

Bates	Date	Author(s)	Recipient(s)	Copied To	Type	Subject	Privilege Asserted
BMS0085- BMS0088	06/26/06	Mark Reed	Stuart Johnston, Esq., V&E	Jack Shandley; Don Wiseman, Esq., Swift, Esq., Swift; Michael Buxton, Esq., V&E	Email	Communication regarding Swift's legal strategy for matters related to ICE	Attorney-Client Work Product Consultative Expert
BMS0089- BMS0092	06/26/06	Mark Reed	Don Wiseman, Esq., Swift, Esq., Swift; Stuart Johnston, Esq., V&E; Jack Shandley	Michael Buxton, Esq., V&E	Email	Communication regarding Swift's legal strategy for matters related to ICE	Attorney-Client Work Product Consultative Expert
BMS0093- BMS0094	06/30/06	Mark Reed	Stuart Johnston, Esq., V&E		Email	BMS Invoice to Vinson & Elkins; communication regarding matters related to ICE	Attorney-Client Work Product Consultative Expert
BMS0096	07/12/06	Mark Reed	Stuart Johnston, Esq., V&E		Email	Communication regarding Swift's legal strategy for matters related to ICE	Attorney-Client Work Product Consultative Expert
BMS0097- BMS0101	07/12/06	Mark Reed	Stuart Johnston, Esq., V&E		Email	Communication regarding Swift's legal strategy for matters related to ICE	Attorney-Client Work Product Consultative Expert
BMS0102	07/21/06	Mark Reed	Stuart Johnston, Esq., V&E; Tim Hill		Email	Communications regarding issues related to Form I-9 for a Swift Employee	Attorney-Client Work Product Consultative Expert
BMS0110	07/25/06	Mark Reed	Stuart Johnston, Esq., V&E		Email	Communication regarding Swift's legal strategy for matters related to ICE	Attorney-Client Work Product Consultative Expert

Bates	Date	Author(s)	Recipient(s)	Copied To	Type	Subject	Privilege Asserted
BMS0113- BMS0115	08/14/06	Mark Reed	C. Michael Buxton, Esq., V&E; Sean McHugh; Jack Shandley	Don Wiseman, Esq., Swift; Esq., Swift; Chandler Keys	Email	Communication regarding Swift's legal strategy for matters related to ICE; discussion regarding implementation of IMAGE program	Attorney-Client Work Product Consultative Expert
BMS0116	08/21/06	Mark Reed	Sam Rovit; Don Wiseman, Esq., Swift, Esq., Swift	Jack Shandley; Sean McHugh; Chandler Keys; Michael Buxton, Esq., V&E	Email	Communication regarding Swift's legal strategy for matters related to ICE	Attorney-Client Work Product Consultative Expert
BMS0118- BMS0129	08/29/06	Mark Reed	Stuart Johnston, Esq., V&E		Email	Draft Swift memo re Employment Eligibility and Identity Verification Policy	Attorney-Client Work Product Consultative Expert
BMS0130- BMS0131	08/31/06	Mark Reed	Michael Buxton, Esq., V&E; Stuart Johnston, Esq., V&E		Email	Communication regarding creating Swift policies for complying with hiring and immigration laws	Attorney-Client Work Product Consultative Expert
BMS0132- BMS0134	09/01/06	Mark Reed	Stuart Johnston, Esq., V&E		Email	Communication regarding creating Swift policies for complying with hiring and immigration laws	Attorney-Client Work Product Consultative Expert
BMS0135- BMS0136	09/06/06	Mark Reed	Stuart Johnston, Esq., V&E	Michael Buxton, Esq., V&E	Email	Communication regarding creating Swift policies for complying with hiring and immigration laws	Attorney-Client Work Product Consultative Expert

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BMS0137- BMS0138	09/06/06	Mark Reed	Stuart Johnston, Esq., V&E		Email	Communication regarding analysis of Swift policies for complying with hiring and immigration laws	Attorney-Client Work Product Consultative Expert
BMS0139- BMS0140	09/06/06	Mark Reed	Stuart Johnston, Esq., V&E		Email	Communication regarding analysis of Swift policies for complying with hiring and immigration laws	Attorney-Client Work Product Consultative Expert
BMS0141- BMS0143	09/07/06	Mark Reed	Stuart Johnston, Esq., V&E	Michael Buxton, Esq., V&E	Email	Communication regarding analysis Swift policies for complying with hiring and immigration laws	Attorney-Client Work Product Consultative Expert
BMS0144	09/08/06	Mark Reed	Stuart Johnston, Esq., V&E		Email	Communications regarding terms of BMS' engagement	Attorney-Client Work Product Consultative Expert
BMS0145- BMS0147	09/11/06	Mark Reed	Jack Shandley; Michael Buxton, Esq., V&E; Don Wiseman, Esq., Swift; Diana Gross	William E. Lawler, Esq., V&E; Stuart Johnston, Esq., V&E	Email	Communication regarding Swift's legal strategy for matters related to ICE	Attorney-Client Work Product Consultative Expert
BMS0148- BMS0149	09/12/06	Mark Reed	Stuart Johnson, Esq., V&E		Email	Communication regarding analysis Swift policies for complying with hiring and immigration laws	Attorney-Client Work Product Consultative Expert

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BMS0150- BMS0153	09/19/06	Mark Reed	Tim Hill; James Hamilton; Stuart Johnson, Esq., V&E; Jack Shandley, Don Wiseman, Esq., Swift, Esq., Swift		Email	Communication regarding BMS' compliance advice for hiring and immigration laws	Attorney-Client Work Product Consultative Expert
BMS0154- BMS0155	09/29/06	Mark Reed	Jack Shandley; Sean McHugh; Michael Buxton, Esq., V&E; William E. Lawler; Chandler Keys; Don Wiseman, Esq., Swift		Email	Communication regarding Swift's legal strategy for matters related to ICE	Attorney-Client Work Product Consultative Expert
BMS0156- BMS0157	10/02/06	Mark Reed	Stuart Johnston, Esq., V&E; Don Wiseman, Esq., Swift; Jack Shandley; Sean McHugh; Michael Buxton, Esq., V&E		Email	Communication regarding BMS' compliance advice for hiring and immigration laws	Attorney-Client Work Product Consultative Expert
BMS0158- BMS0159	10/02/06	Mark Reed	Stuart Johnston, Esq., V&E		Email	Communication regarding Swift's legal strategy for matters related to ICE	Attorney-Client Work Product Consultative Expert
BMS0160	10/02/06	Mark Reed	James Hamilton; Stuart Johnston, Esq., V&E		Email	Communication regarding BMS' compliance advice for hiring and immigration laws	Attorney-Client Work Product Consultative Expert

Bates	Date	Author(s)	Recipient(s)	Copied To	Type	Subject	Privilege Asserted
BMS0161	10/03/06	Mark Reed	Michael Buxton, Esq., V&E; Stuart Johnston; William Lawler		Email	Communication regarding Swift's legal strategy for matters related to ICE	Attorney-Client Work Product Consultative Expert
BMS0162-BMS0163	10/06/06	Mark Reed	Michael Buxton, Esq., V&E		Email	Communication regarding Swift's legal strategy for matters related to ICE	Attorney-Client Work Product Consultative Expert
BMS0164-BMS0165	10/06/06	Mark Reed	Michael Buxton, Esq., V&E		Email	Communication regarding Swift's legal strategy for matters related to ICE	Attorney-Client Work Product Consultative Expert
BMS0166-BMS0169	10/08/06	Mark Reed	Michael Buxton, Esq., V&E; Don Wiseman, Esq., Swift; Jack Shandle; Chandler Keys; Marc B. Tucker; Carl Hampe, Esq., Baker & MacKenzie	William E. Lawler	Email	Communication regarding Swift's legal strategy for matters related to ICE	Attorney-Client Work Product Consultative Expert
BMS0170	10/08/06	Mark Reed	Don Wiseman, Esq., Swift		Email	Communication regarding Swift's legal strategy for matters related to ICE	Attorney-Client Work Product Consultative Expert
BMS0171	10/09/06	Mark Reed	Michael Buxton, Esq., V&E		Email	Communication regarding Swift's legal strategy for matters related to ICE	Attorney-Client Work Product Consultative Expert

Bates	Date	Author(s)	Recipient(s)	Copied To	Type	Subject	Privilege Asserted
BMS0172	10/20/06	Mark Reed	Don Wiseman, Esq., Swift; Jack Shandley; Michael Buxton, Esq., V&E		Email	Communication regarding Swift's legal strategy for matters related to ICE	Attorney-Client Work Product Consultative Expert
BMS0173	10/31/06	Mark Reed	Michael Buxton, Esq., V&E		Email	Communication regarding Swift's legal strategy for matters related to ICE	Attorney-Client Work Product Consultative Expert
BMS0174	11/01/06	Mark Reed	Michael Buxton, Esq., V&E		Email	Communication regarding Swift's legal strategy for matters related to ICE	Attorney-Client Work Product Consultative Expert
BMS0175- BMS0176	11/02/06	Mark Reed	Jack Shandley	Michael Buxton, Esq., V&E	Email	Communication regarding Swift's legal strategy for matters related to ICE	Attorney-Client Work Product Consultative Expert
BMS0177- BMS0179	11/03/06	Mark Reed	Don Wiseman, Esq., Swift	Michael Buxton, Esq., V&E	Email	Communication regarding Swift's legal strategy for matters related to ICE	Attorney-Client Work Product Consultative Expert
BMS0180- BMS0182	11/15/06	Mark Reed	Stuart Johnston, Esq., V&E		Email	Communication regarding BMS invoices to Vinson & Elkins	Attorney-Client Work Product Consultative Expert
BMS0183- BMS0184	11/21/06	Mark Reed	Don Wiseman, Esq., Swift		Email	Communication regarding Swift's legal strategy for matters related to ICE	Attorney-Client Work Product Consultative Expert
BMS0185- BMS0186	11/22/06	Mark Reed	Jack Shandley		Email	Communication regarding Swift policies for compliance with hiring and immigration laws	Attorney-Client Work Product Consultative Expert

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BMS0187- BMS0188	11/28/06	Mark Reed	Michael Buxton, Esq., V&E		Email	Communication regarding Swift's legal strategy for matters related to ICE	Attorney-Client Work Product Consultative Expert
BMS0189	11/28/06	Mark Reed	Michael Buxton, Esq., V&E		Email	Communication regarding BMS' engagement with Swift and Swift's legal strategy for matters related to ICE	Attorney-Client Work Product Consultative Expert
BMS0190- BMS0193	11/28/06	Mark Reed	Michael Buxton, Esq., V&E		Email	Communication regarding Swift's legal strategy for matters related to ICE	Attorney-Client Work Product Consultative Expert
BMS0194- BMS0195	12/01/06	Mark Reed	Jack Shandley	Michael Buxton, Esq., V&E	Email	Communication regarding Swift's legal strategy for matters related to ICE; redacted document produced	Attorney-Client Work Product Consultative Expert
BMS0196	12/01/06	Mark Reed	Michael Buxton, Esq., V&E		Email	Communication regarding Swift's legal strategy for matters related to ICE	Attorney-Client Work Product Consultative Expert
BMS0197	12/01/06	Mark Reed	Jack Shandley		Email	Communication regarding Swift's legal strategy for matters related to ICE	Attorney-Client Work Product Consultative Expert
BMS0198- BMS0199	12/07/06	Mark Reed	Michael Buxton, Esq., V&E; Jack Shandley; Don Wiseman, Esq., Swift	William Lawler	Email	Communication regarding Swift's legal strategy for matters related to ICE	Attorney-Client Work Product Consultative Expert

Bates	Date	Author(s)	Recipient(s)	Copied To	Type	Subject	Privilege Asserted
BMS0200- BMS0202	12/07/06	Mark Reed	Michael Buxton, Esq., V&E; Jack Shandley; Don Wiseman, Esq., Swift	William E. Lawler	Email	Communication regarding Swift's legal strategy for matters related to ICE	Attorney-Client Work Product Consultative Expert
BMS0203	12/08/06	Mark Reed	Michael Buxton, Esq., V&E; Don Wiseman, Esq., Swift		Email	Communication regarding Swift's legal strategy for matters related to ICE	Attorney-Client Work Product Consultative Expert
BMS0231- BMS0234	12/08/06	Mark Reed	Michael Buxton, Esq., V&E		Email	Communication regarding Swift's legal strategy for matters related to ICE	Attorney-Client Work Product Consultative Expert
BMS0235- BMS0236	12/08/06	Mark Reed	Michael Buxton, Esq., V&E		Email	Communication regarding Swift's legal strategy for matters related to ICE	Attorney-Client Work Product Consultative Expert
BMS0238- BMS0242	12/11/06	Mark Reed	William E. Lawler; Don Wiseman, Esq., Swift	Jack Shandley; C. Michael Buxton, Esq., V&E; Sean McHugh	Email	Communication regarding Swift's legal strategy for matters related to ICE	Attorney-Client Work Product Consultative Expert
BMS0243- BMS0247	12/12/06	Mark Reed	William E. Lawler; Don Wiseman, Esq., Swift	Jack Shandley; C. Michael Buxton, Esq., V&E	Email	Communication regarding Swift's legal strategy for matters related to ICE	Attorney-Client Work Product Consultative Expert
BMS0251- BMS0256	12/12/06	Mark Reed	Michael Buxton, Esq., V&E		Email	Communication regarding Swift's legal strategy for matters related to ICE	Attorney-Client Work Product Consultative Expert

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BMS0257	12/12/06	Mark Reed	Michael Buxton, Esq., V&E		Email	Communication regarding Swift's legal strategy for matters related to ICE	Attorney-Client Work Product Consultative Expert
BMS0258-BMS0259	12/12/06	Mark Reed	Michael Buxton, Esq., V&E		Email	Communication regarding Swift's legal strategy for matters related to ICE	Attorney-Client Work Product Consultative Expert
BMS0260	12/13/06	Mark Reed	Don Wiseman, Esq., Swift; Michael Buxton, Esq., V&E		Email	Communications regarding Swift's response to ICE raid	Attorney-Client Work Product Consultative Expert
BMS0261-BMS0262	12/17/06	Mark Reed	Michael Buxton, Esq., V&E		Email	Communication regarding Swift's legal strategy for matters related to ICE	Attorney-Client Work Product Consultative Expert
BMS0263-BMS0264	12/18/06	Mark Reed	Michael Buxton, Esq., V&E		Email	Communication regarding Swift's legal strategy for matters related to ICE	Attorney-Client Work Product Consultative Expert
BMS0265	12/18/06	Mark Reed	Michael Buxton, Esq., V&E; William E. Lawler; Don Wiseman, Esq., Swift		Email	Communication regarding Swift's legal strategy for matters related to ICE	Attorney-Client Work Product Consultative Expert
BMS0266	12/19/06	Mark Reed	Michael Buxton, Esq., V&E; Don Wiseman, Esq., Swift; William E. Lawler		Email	Communication regarding Swift's legal strategy for matters related to ICE	Attorney-Client Work Product Consultative Expert

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BMS0267- BMS0268	12/20/06	Mark Reed	Michael Buxton, Esq., V&E	Don Wiseman, Esq., Swift; Jack Shandley; William E. Lawler	Email	Communication regarding Swift's legal strategy for matters related to ICE	Attorney-Client Work Product Consultative Expert
BMS0269- BMS0270	12/20/06	Mark Reed	Don Wiseman, Esq., Swift; C. Michael Buxton, Esq., V&E; William E. Lawler		Email	Communication regarding Swift's legal strategy for matters related to ICE	Attorney-Client Work Product Consultative Expert
BMS0298- BMS0319	10/00/06				Draft	Draft Affidavit of Jack Shandley on Behalf of Swift & Company In Support of a Temporary Restraining Order	Attorney-Client Work Product Consultative Expert
BMS0411	Undated	Mark Reed	Stuart Johnston, Esq., V&E		Memo	Swift & Co. Corporate Hiring Policy / Procedures	Attorney-Client Work Product Consultative Expert
BMS0412- BMS0423	Undated	BMS			Draft	Draft - BMS Compliance Assessment Report re Grand Island, Nebraska August 22-24, 2006 pursuant to V&E engagement	Attorney-Client Work Product Consultative Expert
BMS0424- BMS0426	Undated	BMS			Draft	Draft - BMS Compliance Review Audit - Executive Summary re Grand Island, Nebraska August 22-24, 2006 pursuant to V&E engagement	Attorney-Client Work Product Consultative Expert

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BMS0427- BMS0429	Undated	BMS			Draft	Draft – BMS Compliance Review Audit – Executive Summary re Marshalltown, Iowa October 10-11, 2006 pursuant to V&E engagement	Attorney-Client Work Product Consultative Expert
BMS0431- BMS0469	10/19/06				Draft	Swift & Company Immigration and Customs Enforcement Briefing (Draft #4) regarding Swift's legal strategy for matters related to ICE	Attorney-Client Work Product Consultative Expert
BMS0470- BMS0482	Undated	BMS			Draft	Draft – BMS Compliance Assessment Report re Cactus, Texas October 25-26, 2006 pursuant to V&E engagement	Attorney-Client Work Product Consultative Expert
BMS0483- BMS0484	Undated	BMS			Draft	Draft – BMS Compliance Review Audit – Executive Summary re Cactus, Texas October 25-26, 2006 pursuant to V&E engagement	Attorney-Client Work Product Consultative Expert
BMS0485- BMS0497	Undated	BMS			Draft	Draft – BMS Compliance Assessment Report re Worthington, Minnesota November 14-15, 2006 pursuant to V&E engagement	Attorney-Client Work Product Consultative Expert
BMS0498- BMS0500	Undated	BMS			Draft	Draft – BMS Compliance Review Audit – Executive Summary re Worthington, Minnesota November 14-15, 2006 pursuant to V&E engagement	Attorney-Client Work Product Consultative Expert

Bates	Date	Author(s)	Recipient(s)	Copied To	Type	Subject	Privilege Asserted
BMS0501- BMS0504	2007				Draft	Draft--Congressional Testimony, Sam Rovit	Attorney-Client Work Product Consultative Expert
BMS0702	05/08/06	BMS	Vinson & Elkins		Invoice	BMS invoice to Vinson & Elkins, #368	Attorney-Client Work Product Consultative Expert
BMS0703	05/31/06	BMS	Vinson & Elkins		Invoice	BMS invoice to Vinson & Elkins, #370	Attorney-Client Work Product Consultative Expert
BMS0704	06/30/06	BMS	Vinson & Elkins		Invoice	BMS invoice to Vinson & Elkins, #374	Attorney-Client Work Product Consultative Expert
BMS0705	08/04/06	BMS	Vinson & Elkins		Invoice	BMS invoice to Vinson & Elkins, #380	Attorney-Client Work Product Consultative Expert
BMS0706	09/01/06	BMS	Vinson & Elkins		Invoice	BMS invoice to Vinson & Elkins, #382	Attorney-Client Work Product Consultative Expert
BMS0707	10/02/06	BMS	Vinson & Elkins		Invoice	BMS invoice to Vinson & Elkins, #387	Attorney-Client Work Product Consultative Expert
BMS0708	10/30/06	BMS	Vinson & Elkins		Invoice	BMS invoice to Vinson & Elkins, #389	Attorney-Client Work Product Consultative Expert
BMS0709	10/30/06	BMS	Vinson & Elkins		Invoice	BMS invoice to Vinson & Elkins, #390	Attorney-Client Work Product Consultative Expert